

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

EMMA GOIDEL, on behalf of herself and all  
others similarly situated,

*Plaintiff,*

-against-

AETNA, INC.

*Defendant.*

Case No. 1:21-cv-07619 (VSB)

**APPLICATION GRANTED  
SO ORDERED**

**VERNON S. BRODERICK**

**U.S.D.J.** 10/26/2021

The protective order will be entered with minor  
modifications.

**JOINT MOTION FOR PROTECTIVE ORDER**

Pursuant to Federal Rule 26(c), Plaintiff Emma Goidel and Defendant Aetna, Inc. respectfully request that the Court enter the attached qualified protective order.

The parties have agreed and stipulated to the protective order attached as Exhibit A in order to engage in discovery for settlement discussion purposes and to engage in discovery while safeguarding protected health information. Because discovery will likely involve disclosure and exchange of details regarding medical treatment and health information related to Aetna members who sought coverage for fertility treatment, which is protected and confidential, a qualified protective order is necessary to ensure confidentiality and safeguard the privacy of these members. If entered, the protective order will govern the handling of documents and any other information or material produced, given, or exchanged by the parties and any non-parties since the inception of this matter.

Accordingly, the parties respectfully request the Court enter the qualified protective order attached to this motion as Exhibit A.

Dated this 25th day of October, 2021.



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#### CERTIFICATE OF SERVICE

I hereby certify that on the 25th day of October, 2021, a true and correct copy of the foregoing was served on all parties through the Court's ECF system.



Earl B. Austin